

EXHIBIT 8

COVINGTON

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By Electronic Mail

May 6, 2020

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Re: Supplemental Custodian Requests for the City of Huntington

Dear Counsel:

On April 30, 2020, the final day of document discovery, the City of Huntington served Supplemental Responses and Objections to Distributor Defendants' First Set of Interrogatories that identified relevant individuals—for the first time—in response to interrogatory 3. Defendants request that Huntington produce the custodial files for these new individuals by Tuesday, May 12.

These newly identified individuals are highly likely to have important, relevant information, as they are members of law enforcement task forces addressing opioid issues, have been involved in the Huntington Quick Response Team, are members of City Council, and/or have led the Huntington Fire Department:

- **Paul Matovich, Police Corporal, Huntington Police Department.**
Huntington has identified Mr. Matovich as a member of the Huntington Violent Crime and Drug Task Force / FBI Task Force and the DEA Heroin Task Force, both of which are responsible for investigating, disrupting, and dismantling drug trafficking organizations operating within and around Huntington. Mr. Matovich has served in the Huntington Police Department since at least 2005. He has been awarded a U.S. Attorney's Law Enforcement & Victim Assistance Award and been recognized as Officer of the Month for his involvement in investigating heroin distribution operations in Huntington.
- **Stephen Maniskas, Police Corporal, Huntington Police Department.**
Huntington has identified Mr. Maniskas as a member of the Huntington Violent Crime and Drug Task Force, which is a collaboration with FBI and other law

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enforcement agencies focused on drug eradication efforts. He has been with the Huntington Police Department for at least a decade.

- **Adrian Rosario, Detective, Huntington Police Department.** Huntington has identified Mr. Rosario as a member of the Huntington Violent Crime and Drug Task Force. He has been with the Huntington Police Department for at least a decade. The Huntington Police Department has recognized Mr. Rosario as Officer of the Month for his work in investigating drug cases.
- **Greg Moore, Sergeant, Huntington Police Department.** Huntington has identified Mr. Moore as a member of the Huntington Violent Crime and Drug Task Force. He has been with the department since at least 2011, and the Huntington Police Department has recognized him as Officer of the Month for a successful heroin investigation.
- **Sid Hinchman, Former Private First Class, Huntington Police Department.** Huntington has identified Mr. Hinchman as a member of the Huntington Violent Crime and Drug Task Force. Mr. Hinchman was with the Huntington Police Department for 15 years, until his retirement in 2018. He received a U.S. Attorney Award for outstanding implementation of the Drug Market Intervention Initiative in Huntington, which aims to shut down open-air drug markets. Additionally, the Huntington Police Department has recognized Mr. Hinchman as Officer of the Month for his successful work on shutting down a drug trafficking organization in Huntington that distributed oxycodone.
- **Charles Shaw, Huntington City Council Member.** Huntington has identified Mr. Shaw as a City Council Member. Mr. Shaw is a current City Council Member, taking the seat vacated by Alex Vence (one of Huntington's agreed-upon custodians). Additionally, Mr. Shaw has overseen the addition of a faith-based element into Huntington's Quick Response Team ("QRT"), which offers education and treatment to individuals who have overdosed.
- **Ralph Rider, Former Deputy Fire Chief.** Huntington has identified Ralph Rider as the interim Fire Chief and the Deputy Fire Chief of the Huntington Fire Department. Mr. Rider has been with the Huntington Fire Department since at least 2003.

Huntington identified all of these individuals for the first time in its supplemental response to Interrogatory No. 3. Given the expedited case schedule, Defendants request that Huntington produce all relevant custodial documents (including emails) for these individuals by May 15. If the case schedule is extended as requested in Defendants' April 17 Motion, Defendants will be amenable to a later production date. We appreciate your prompt attention to this matter.

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Sincerely,

/s/ Laura Flahive Wu

Laura Flahive Wu